

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**MICHAEL CLEMENT,
Debtor**

**: Chapter 13
: Bankruptcy No: 16-17048**

**MOTION TO CONVERT FROM CHAPTER 13 CASE
TO CASE UNDER CHAPTER 7**

COMES NOW, the Debtor, Michael Clement, who files this motion to convert from a Chapter 13 to a Chapter 7 and in support thereof, says:

1. The Debtor is Michael Clement.
2. The Debtor filed a petition for protection pursuant to Chapter 13 of the Bankruptcy Act 11 U.S.C. § 101 et. seq.
3. The Debtor was able to make the plan payments prior to a child support order in the amount of \$300.00.
4. Solely as a result of the new child support order, in the amount of \$300.00 the debtor is not able to continue to make his plan payments.
5. The debtor initially estimated that he would be able to make a plan payment of \$949.26 however; with the child support payment of \$300.00 he would not be able to make the plan payments.

WHEREFORE, the Debtor, **Michael Clement**, pray this Honorable Court to:

- A. Grant relief in accordance with Chapter 7 of the Bankruptcy Code;

and

B. Grant such other relief as this Court deems fitting and just.

Dated: 11/29/17

/s/Joseph Bambrick
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